

## **Exhibit C**

## RAK Project Update

### Executive Summary:

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**In the US**, KM's hired a team of advisors managed by Farhad Azima (FA) in order to spread allegations against our client. The main allegations against the client are on human rights issues and in particular the allegation that RAK uses a dedicated facility in RAK where it imprisons and torture political opponents.

FA, who might also be responsible for paying the US team, handles all KM's activities in the US. KM's lawyer in the US, **Kirby D. Behre**, hired a consultant, who is a former WSJ reporter, named **Christopher Cooper**, who due to his good contacts. Cooper approached a British reporter named **Simon Goodly** of **The Guardian** and briefed him on the RAK torture allegations, in order to raise public opinion against RAK and to harness international civil rights organizations to the subject.

According to our source, FA also hired a private investigator from Northern Virginia name 'Joseph Aboud', an American – Egyptian who seems to have SIGINT capabilities, and probably managed to get access to the client's Email traffic. We couldn't verify until now the identity and capabilities of Aboud, but we are working on it.

Our sources have reported that KM's team suspects that they have an information leak since they noticed some of RAK's actions in the last few months. They believe that the client is having someone monitor their activities either electronically or in other methods.

## **KM efforts against the client**

### **FA and the US Advisory Team**

In continuation to our previous report, we were informed by several new sources that FA is managing KM's efforts in the US and perhaps even paying their bills.

At the moment, KM's strategy in the US is to spread human rights violations allegations against the client. In particular the allegations focus on the notion that RAK uses a dedicated facility in RAK where it imprisons and torture political opponents. According to KM, the main figure assisting our client to cover this alleged activity is **Niel Gerard**, a partner in **Dechert LLP** (London) law firm. Additionally, KM claims that the reach of RAK's No. 1 is also away from RAK, claiming that the client recently got a Jon Doe locked up in the Republic of Georgia upon his request.

According to our sources KM's US lawyer, **Kirby D. Behre**<sup>1</sup> (US first tier commercial litigator from Washington D.C.), hired a consultant named **Christopher Cooper**,<sup>2</sup> formerly a reporter for the WSJ and currently the owner of '**Potomac Square Group**',<sup>3</sup> an independent consultancy that provides public affairs and government relations counsel.



*Christopher Cooper*

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<sup>1</sup> <http://www.millerchevalier.com/OurPeople/KirbyDBehre> - Behre, in the professional level, is a leading litigator deals mainly with white collar investigations, represents companies and individuals in complex business litigation, government and internal investigations, criminal prosecutions and regulatory matters worldwide.

<sup>2</sup> <https://www.linkedin.com/pub/christopher-cooper/18/525/559>

<sup>3</sup> <https://bahrainwatch.org/pr/potomac-square-group.php>



Cooper, due to his good contacts, has approached a British reporter named **Simon Goodly** who works for **The Guardian** and briefed him on the RAK torture allegations, in order to raise public opinion against RAK and to harness international civil rights organizations to the subject.



*Simon Goodly*

Goodly showed interest in the subject, although the story does not have at this point any evidence but only hearsay and testimonies. One of the main testimonies they rely upon was given by the wife of a person who is allegedly jailed in RAK named Karam (it is probably **Karam Al Sadeq**, who was RAKIA's in-house counsel and is in for almost a year)<sup>4</sup>.

In addition, Christopher Cooper is already in touch with several organizations such as Amnesty and others that allegedly already showed interest in the subject. The KM team main angle is that RAK's uses Niel Gerard<sup>5</sup> to cover up the alleged torture activities. According to our sources, Goodly set a meeting with Gerard, but the later canceled in the last minute.

Both FA and KM are concerned regarding several arrests made by the RAK authorities. They are looking to check for INTEROL's red notice against people in KM's inner cycle.

Moreover, it is apparent that FA has hired an investigator from Northern Virginia name '**Joseph Aboud**', an American - Egyptian who seems to have SIGINT capabilities, and probably managed to get access to the client's Email traffic.

KM's team suspects that they have an information leak. They are afraid that the client is well aware regarding their activities.

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<sup>4</sup> <http://www.zoominfo.com/p/Karam-Al%20Sadeq/1930560353>

<sup>5</sup> [http://www.dechert.com/neil\\_gerrard/](http://www.dechert.com/neil_gerrard/)

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**Summary, Conclusion and Queries**

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As we reported above, KM's US team has a certain plan to smear RAK and its ruler with human right allegations. As far as we know, at this point, they do not have any evidence to back up these allegations, but they started gathering information for a campaign, based on hearsay and testimonies, and started searching for a platform to make it public. The campaign is not public yet, so we will be able to gather intelligence on their progress in order to monitor their activities and attempt to contain or ruin their plans.

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